IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BOSTON DIVISION

| ELEANOR McCULLEN, JEAN | |
|---------------------------------|-----------------|
| BLACKBURN ZARRELLA, |) |
| GREGORY A. SMITH, CARMEL |) |
| FARRELL, and ERIC CADIN, |) |
| | Civil Action No |
| Plaintiffs, |) |
| |) |
| v. |) |
| |) |
| MARTHA COAKLEY, Attorney |) |
| General for the COMMONWEALTH OF |) |
| MASSACHUSETTS, |) |
| |) |
| Defendant. |) |
| | |

MOTION TO ADMIT TIMOTHY D. CHANDLER PRO HAC VICE

Philip D. Moran, a member in good standing of the Bar of this Court, hereby moves for the admission of Timothy D. Chandler to participate in the conduct of the trial of this action and related pre-trial and post-trial proceedings on behalf of Plaintiffs. In support of this motion, Mr. Chandler states as follows:

- 1. I am a licensed attorney with three (3) years experience in federal civil rights and First Amendment litigation. My business address is Alliance Defense Fund; 101 Parkshore Drive, Suite 100; Folsom, California 95630. My telephone number is (916) 932-2850. My email address is tchandler@telladf.com.
- 2. I am an active member in good standing of the State Bar of California (Bar # 234325). I am admitted to practice, and in good standing, in the United States District Courts for the Northern, Southern, Eastern, and Central Districts of California, as well as the United States Court of Appeal for the Ninth Circuit.

charges, of any kind, and my name does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. There are no disciplinary proceedings

I have never been subject to professional disciplinary proceedings, or criminal

currently pending against me.

3.

4. I will familiarize myself with and comply with the standards of professional

conduct required of members of the Massachusetts State Bar and the local rules of this Court.

5. Attached hereto is a true and correct copy of a Certificate of Good Standing from

the United States District Court for the Eastern District of California, dated December 26, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

/s/Timothy D. Chandler

Timothy D. Chandler

WHEREFORE, movant hereby moves the court to admit Timothy D. Chandler pro hac

vice to appear on behalf of Plaintiffs in this action.

CERTIFICATION OF COMPLIANCE

Pursuant to Local Rule 7.1(a)(2), the undersigned hereby certifies that on Monday,

December 31, 2007, counsel for Plaintiffs conferred with Kenneth W. Salinger, Esq.,

Administrative Law Division, Office of the Attorney General, Commonwealth of Massachusetts,

who stated that the Commonwealth does not oppose this motion.

Respectfully submitted,

/s/ Philip D. Moran

Philip D. Moran, MA Bar # 353920

Philip D. Moran P.C.

265 Essex Street, Suite 202

Salem, Massachusetts 01970

Tel: (978) 745-6085

Fax: (978) 741-2572

Email: philipmoranesq@aol.com

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